

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

H-D U.S.A., LLC,

Plaintiff,

v.

THE PARTNERSHIPS and
UNINCORPORATED ASSOCIATIONS
IDENTIFIED ON SCHEDULE “A”,

Defendants.

Case No. 21-cv-00499

Judge Jorge L. Alonso

Magistrate Judge Sheila M. Finnegan

PRELIMINARY INJUNCTION ORDER

THIS CAUSE being before the Court on Plaintiff H-D U.S.A., LLC’s (“Harley-Davidson” or “Plaintiff”) Motion for Entry of a Preliminary Injunction, and this Court having heard the evidence before it hereby GRANTS Plaintiff’s Motion for Entry of a Preliminary Injunction in its entirety against the fully interactive, e-commerce stores¹ operating under the seller aliases identified in Schedule A to the Complaint and attached hereto (the “Seller Aliases”).

THIS COURT HEREBY FINDS that it has personal jurisdiction over the Defendants since the Defendants directly target their business activities toward consumers in the United States, including Illinois. Specifically, Defendants have targeted sales to Illinois residents by setting up and operating e-commerce stores that target United States consumers using one or more Seller Aliases offer shipping to the United States, including Illinois, accept payment in U.S. dollars and have sold products using infringing and counterfeit versions of Harley-Davidson’s federally registered trademarks (the HARLEY-DAVIDSON Trademarks”) to residents of Illinois. A list of the HARLEY-DAVIDSON Trademarks is included in the below chart.

¹ The ecommerce store urls are listed on Schedule A hereto under the Online Marketplaces.

REGISTRATION NUMBER	REGISTERED TRADEMARK	REGISTRATION DATE	INTERNATIONAL CLASSES
4,771,447	HARLEY-DAVIDSON	July 14, 2015	For: House mark for a full line of jewelry in class 014
3,690,031	HARLEY-DAVIDSON	Sep. 29, 2009	For: Non-luminous, non-mechanical tin signs, non-luminous, non-mechanical metal signs, tool boxes of metal, tool chests of metal, key rings of metal, and metal personal identification tags in class 006
3,490,890	HARLEY-DAVIDSON	Aug. 26, 2008	For: House mark for a line of motorcycles, structural parts for motorcycles and related motorcycle accessories, namely, seats, backrests, decorative fuel tank panels, transmission gears, fuel tanks, wheel sprockets, gear shifts, clutches, battery covers and straps, front rear, and intermediate kickstands, hub caps, shift knobs, foot rests and extensions, windshields, leg shields, fender tips, brake pedals, handlebar grips, safety guards, namely, bars for attachment to motorcycles, steering dampers, shock absorbers, spare wheels, spare wheel carriers, boot guards, namely, mud flaps and fenders, saddle covers, luggage carriers, license plate frames, handlebar cross bars, foot pedal pads, tank and fender pads, rearview, fenders and skirts, and wheel balance weights in class 012

3,393,840	HARLEY-DAVIDSON	Mar. 11, 2008	For: House mark for a full line of clothing, footwear and headwear in class 025
2,281,489	HARLEY-DAVIDSON	Sep. 28, 1999	For: Necklaces, bracelets, and watch bands in class 014
1,621,383	HARLEY-DAVIDSON	Nov. 06, 1990	For: Model toy motorcycles, miniature motorcycle replicas, model toy trucks, electronically operated toy motorcycles in class 028
1,606,282	HARLEY-DAVIDSON	Jul. 17, 1990	For: Safety goggles, protective helmets and sunglasses in class 009
1,602,474	HARLEY-DAVIDSON	Jun. 19, 1990	For: Belt buckles in class 026
1,450,348	HARLEY-DAVIDSON	Aug. 04, 1987	<p>For: metal articles, namely, key fobs, key chains and license plate holders in class 006</p> <p>For: Knife sheaths in class 008</p> <p>For: Necklaces, earrings, pins of non-precious metals, clocks and watches in class 014</p> <p>For: Children's books, bumper stickers, removable tattoos, pressure sensitive decals, checkbook covers, and playing cards in class 016</p> <p>For: Leather goods, namely, purses, wallets, duffle bags, motorcycle saddle bags, and key fobs in class 018</p>


			<p>For: Mirrors in class 020</p> <p>For: Mugs, drinking glasses, coasters, decanters, cups, and plastic mugs in class 021</p> <p>For: Towels, and bed spreads in class 024</p> <p>For: Sweat pants, sweaters, suspenders, scarves, bandanas, leather clothing, namely, jackets, vests, gloves, jeans, chaps, tops, boots, shorts, caps, belts, and parts of footwear, namely boot tips, in class 025</p> <p>For: Stuffed toy animals, toy banks, and model kits in class 028</p> <p>For: Cigarette cases, lighter cases, and cigarette lighters in class 034</p>
1,311,457	HARLEY-DAVIDSON	Dec. 25, 1984	<p>For: Repair and Servicing of Motorcycles in class 037</p> <p>For: Retail store services in the field of motorcycles in class 042</p>
1,234,404	HARLEY-DAVIDSON	Apr. 12, 1983	<p>For: Sunglasses and Protective Helmets for Motorcyclists in class 009</p> <p>For: Clothing-Namely, Jackets, Pants, Shirts, T-Shirts, Vests, Jeans, Riding Suits, Bandannas, Rain Suits, Shorts, Nightgowns, Halters, Underwear, Tank</p>



			Tops, Sweatshirts, Night Shirts, Socks, Gloves, Hats, Caps and Boots in class 025
1,219,955	HARLEY-DAVIDSON	Dec. 14, 1982	For: Parts and service manuals for motorcycles, parts catalogs for motorcycles, newsletters and magazines dealing with motorcycles, calendars, posters, and decals in class 016
1,078,871	HARLEY-DAVIDSON	Dec. 06, 1977	For: Vehicles-namely, motorcycles in class 012
526,750	HARLEY – DAVIDSON	Jun. 27, 1950	For: Motorcycles and structural parts thereof; accessories-namely, intermediate stands, seats, foot rests and extensions, windshields, fender tips, exhaust stacks, grips, name plates, saddle covers, luggage carriers, license frames, foot pedal pads, tandem seats, foot rests, and rear view mirrors in classes 007, 012, 022, and 027
508,160	HARLEY-DAVIDSON	Apr. 05, 1949	For: Electric lamps and spare parts for same; spark plugs; and electric signs in classes 007, 009, 011, 012, and 015
507,163	HARLEY-DAVIDSON	Mar. 01, 1949	For: Motorcycle shirts; sweaters; breeches; neckties; coveralls; rain coats and hats; jackets; helmets; caps; and boots in class 025




1,708,362	HARLEY	Aug. 18, 1992	For: Embroidered patches for clothing in class 026
1,683,455	HARLEY	Apr. 14, 1992	For: Shirts, tank tops, boots, and sweatshirts in class 025
1,406,876	HARLEY	Aug. 26, 1986	For: Clothing; namely--tee shirts for men, women and children; knit tops for women and girls; and children's shirts in class 025
1,352,679	HARLEY	Aug. 06, 1985	For: Motorcycles in class 012
4,955,539	HARLEY	May 10, 2016	For: Watches, rings, bracelets, necklaces, earrings, pins being jewelry; jewelry, namely, wrist cuffs, pendants, charms and ride beads for making jewelry in class 014
1,793,137	HARLEY OWNERS GROUP	Sep. 14, 1993	<p>For: Hunting knives, pocket knives and knife cases in class 008</p> <p>For: Road atlases, newsletters, magazines relating to motorcycling, playing cards, and decals in class 016</p> <p>For: Key fobs, luggage, tote bags, and travel bags in class 018</p> <p>For: Plastic and ornamental pins and badges in class 020</p> <p>For: Glasses, mugs, cups, and insulated can holders in class 021</p>


			<p>For: Textile flags and banners in class 024</p> <p>For: Clothing, namely, shirts, sweatshirts, t-shirts, caps, hats, jacket, vests, and bandanas in class 025</p> <p>For: Belt buckles and ornamental patches in class 026</p>
1,654,280	HD	Aug. 20, 1991	For: Jewelry, namely lapel pins, earrings, necklaces and bracelets in class 014
2,315,877	HD	Feb. 8, 2000	For: Shirts, jackets, vests, T-shirts, nightgowns, sweatshirts, nightshirts, gloves, hats, leather gloves in class 025
1,534,449	HD	Apr. 11, 1989	For: Decorative cloth patches and belt buckles of non-precious metal in class 026
2,042,130	HD	Mar. 4, 1997	For: Cigarette lighters, cigarette cases not made of precious metals, and holders for cigarette lighters not made of precious metals in class 034
1,716,992	HOG	Sep. 15, 1992	<p>For: Metal badges; figurines made of metal in class 006</p> <p>For: Clocks, watches, jewelry of precious and non-precious metal, namely, pins, charms, earrings, bracelets, necklaces, and rings; ornamental lapel pins; ashtrays, cigarette cases and holders of cigarette</p>

			<p>lighters of precious metals; belt buckles of precious metal in class 014</p> <p>For: Greeting cards, road atlas, posters, calendars, newsletters, books and magazines relating to motorcycling, paper banners relating to motorcycling, playing cards, decals, note paper, pens and pencils, checkbook clutches in class 016</p> <p>For: Drinking steins; glassware, namely, plates, cup saucers, glasses and other containers for food and beverage; mugs, cups, insulated can holders, commemorative plates, toothbrushes, quencher cups and figurines made of ceramic, porcelain and glass; leather can, glass and mug holders in class 021</p> <p>For: Flags and banners not of paper in class 024</p> <p>For: Clothing, namely, shirts, sweatshirts, t-shirts, caps, hats, jackets, vests, socks, shoes, boots, scarves, belts, sweat pants, pants, bandanas, gloves, suspenders, chaps, rainsuits, and mittens in class 025</p>
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			For: Belt buckles not of precious metals, ornamental pins and embroidered patches for clothing in class 026
1,263,936		Jan. 17, 1984	<p>For: Medallions and non-luminous non-mechanical signs made primarily of metal and plastic in class 006</p> <p>For: Sunglasses, battery chargers, protective motorcycle crash helmets and luminous signs in class 009</p> <p>For: Electric lamps in class 011</p> <p>For: Mud flaps, fuel door plates, air cleaners, radio caddies, motorcycle tank and fender sets, leather motorcycle bags and motorcycles in class 012</p> <p>For: Jewelry - namely, necklaces, rings and key fobs in class 014</p> <p>For: Posters, paper decals and playing cards in class 016</p> <p>For: Wallets in class 018</p> <p>For: Decorative wall plaques and mirrors in class 020</p> <p>For: Mugs and insulated drinking steins in class 021</p> <p>For: Towels in class 024</p>



			<p>For: Clothing - namely, t-shirts, jackets, blue jeans, sweat shirts, underwear, bandanas, headwear, socks, boots, cycle riding suits, belts and suspenders in class 025</p> <p>For: Embroidered patches, belt buckles and lapel, hat and stick pins all of nonprecious metals in class 026</p> <p>For: Cigarette lighters in class 034</p>
4,601,391		Sep. 09, 2014	For: Cell phone covers in class 009
3,559,365		Jan. 13, 2009	<p>For: House mark for a line of motorcycles, structural parts for motorcycles, and related motorcycle accessories, namely, seats, backrests, decorative fuel tank panels, transmission gears, fuel tanks, wheel sprockets, gear shifts, clutches, battery covers and straps, front, rear, and intermediate kickstands, hub caps, shift knobs, foot rests and extensions, windshields, leg shields, fender tips, brake pedals, handlebar grips, safety guards, namely, bars for attachment to motorcycles, steering dampers, shock</p>


			absorbers, spare wheels, spare wheel carriers, boot guards, namely, mud flaps and fenders, saddle covers, luggage carriers, license plate frames, handlebar cross bars, foot pedal pads, tank and fender pads, rearview mirrors, fenders and skirts, and wheel balance weights in class 012
3,393,839		Mar. 11, 2008	For: House mark for a full line of clothing, footwear and headwear in class 025
3,185,946		Dec. 19, 2006	For: Jackets, baseball hats, caps, shirts and T-shirts in class 025
1,711,882		Sep. 01, 1992	For: Embroidered patches for clothing in class 026
1,660,539		Oct. 15, 1991	For: Knives; namely, buck knives, sporting and hunting knives, folding pocket knives, knife cases therefor, and tool kits comprising wrenches and pliers in class 008






		<p>For: sunglasses, and motorcycle parts; namely, gauges, batteries, and cruise controls in class 009</p> <p>For: Flashlights in class 011</p> <p>For: motorcycles and motorcycle parts; namely, air cleaners, drive belts, belt guards, brakes, chains, clutches, crankcases, engine cylinders, fenders and fender supports, footboards, forks, fuel tanks, leg guards, handlebars, cylinder heads, mirrors, oil filters, oil pumps, seats, shock absorbers, backrests, wheels, and windshields in class 012</p> <p>For: Ankle bracelets, bracelets, earrings, necklaces, rings, tie tacks, watch bands, watches, wall clocks, and ornamental lapel pins in class 014</p> <p>For: Books about motorcycles, calendars, decals, pens, photo albums, posters, and removable tattoos in class 016</p> <p>For: Holders for cans in the nature of a rubber cylinder, duffle bags, garment bags, key fobs, suitcases, and wallets in class 018</p> <p>For: Wall mirrors and wall plaques in class 020</p>
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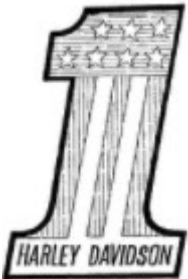


			<p>For: Drinking glasses, mugs, and can holders in the nature of an insulated rubber cylinder in class 021</p> <p>For: Towels in class 024</p> <p>For: Belts, chaps, denim pants, gloves, hats, caps, jackets, neckties, night shirts, pants, rain suits, shirts, socks, suspenders, sweaters, sweatshirts, tank tops, athletic shoes, shoes, boots, t-shirts, underwear, vests and wristbands in class 025</p> <p>For: Belt buckles not made of precious metal, boot chains, and embroidered patches for clothing in class 026</p> <p>For: Automobile floor mats in class 027</p> <p>For: Toy trucks in class 028</p> <p>For: Lighter holders, cigarette cases, lighter cases, and lighters, all of the foregoing not being made of precious metal in class 034</p>
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1,263,936		Jan. 17, 1984	<p>For: Medallions and non-luminous non-mechanical signs made primarily of metal and plastic in class 006</p> <p>For: Sunglasses, battery chargers, protective motorcycle crash helmets and luminous signs in class 009</p> <p>For: Electric lamps in class 011</p> <p>For: Mud flaps, fuel door plates, air cleaners, radio caddies, motorcycle tank and fender sets, leather motorcycle bags and motorcycles in class 012</p> <p>For: Jewelry-Namely, Necklaces, Rings, and Key Fobs in class 014</p> <p>For: Posters, paper decals and playing cards in class 016</p> <p>For: Wallets in class 018</p> <p>For: Decorative Wall Plaques and Mirrors in class 020</p> <p>For: Mugs and Insulated Drinking Steins in class 021</p> <p>For: Towels in class 024</p> <p>For: Clothing-Namely, T-Shirts, Jackets, Blue Jeans, Sweat Shirts, Underwear, Bandanas, Headwear,</p>
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			<p>Socks, Boots, Cycle Riding Suits, Belts and Suspenders in class 025</p> <p>For: Embroidered patches, belt buckles and lapel, hat and stick pins all of non-precious metals in class 026</p> <p>For: Cigarette lighters in class 034</p>
1,205,380		Aug. 17, 1982	<p>For: Motorcycles in class 012</p> <p>For: Clothing-Namely, T-Shirts in class 025</p>
1,224,868		Jan. 25, 1983	<p>For: Decorative Items for Motorcycles-Namely, Medallions in class 006</p> <p>For: Fitted Motorcycle Covers in class 012</p> <p>For: Key Ring Fobs in class 014</p> <p>For: General Purpose Decals; Decorative Items for Motorcycles-Namely, Decals, and Metallic Foil Decals in class 016</p> <p>For: Drinking Cups and Mugs in class 021</p> <p>For: Clothing-Namely, Jackets, T-Shirts, Tank Tops, Sweat Shirts, Bandannas, Hats, Caps, and Boots in class 025</p> <p>For: Stick, Lapel, and Hat</p>

			<p>Pins, All of Nonprecious Metals, and Decorative Cloth Patches in class 026</p> <p>For: Cigarette Lighters in class 034</p>
2,376,674		Aug. 15, 2000	<p>For: Metal locks in class 006</p> <p>For: Motorcycle parts, namely, spark plugs in class 007</p> <p>For: Optical and safety equipment, namely, sunglasses and motorcycle helmets in class 009</p> <p>For: Motorcycle parts, namely, mirrors, drive belts made of rubber, swing arm pivot covers, axle nut covers, handgrips, oil pump covers, air cleaner covers, derby covers, caliper covers, seats, brake pedals, motorcycle saddlebags, saddlebag liners, timer covers and fender tips in class 012</p> <p>For: Jewelry in class 014</p> <p>For: Leather goods, namely traveling bags and saddlery in class 018</p> <p>For: Leather gloves in class 025</p>


1,741,456		Dec. 22, 1992	For: Embroidered patches and belt buckles not of precious metals in class 026
1,511,060		Nov. 01, 1988	For: Clothing, namely, boots, sweat shirts, jeans, hats, caps, scarves, motorcycle riding suits, neck ties, shirts, t-shirts, jackets, vest, ladies tops, bandanas in class 025
3,447,304		Jun. 17, 2008	For: A full line of clothing in class 025
3,697,874		Oct. 20, 2009	For: Motorcycles and structural parts therefor in class 012
3,697,875		Oct. 20, 2009	For: Shirts, hats, caps in class 025

3,074,276		Mar. 28, 2006	For: Metal key chains in class 006
3,018,481		Nov. 22, 2005	For: Ornamental novelty pins in class 026
2,979,002		Jul. 26, 2005	For: Drinking glasses, mugs, and beverage glassware in class 021
2,973,501		Jul. 19, 2005	For: Bandannas, jackets, shirts, caps, hats, T-shirts, and leather jackets in class 025

4,601,394		Sep. 09, 2014	For: Cell phone covers in class 009
3,304,863		Oct. 02, 2007	For: Metal key fobs and non-luminous and non-mechanical metal signs in class 006
4,844,360		Nov. 03, 2015	For: Parts of motorcycles, excluding parts of all motors and engines, namely, derby covers, air cleaner trim, timer covers, battery cover band, fuel caps, brake caliper inserts, fender skirts, console doors, head lamp visors, medallions, foot pegs, gearshift linkages, foot board covers, handlebar clamps, hand grips, fuel gauges, guard rail inserts, axle nut covers, breather end cap, valve stem caps, foot boards, turn signal visors, pivot bolt covers, tank panel, fender tip lens kit, console insert, air cleaner cover, decorative end caps, mirrors and mounting hardware for the aforesaid goods in class 012

4,771,442		Jul. 14, 2015	For: A full line of jewelry in class 014
4,528,269		May 13, 2014	For: Jewelry, namely, earrings, necklaces in class 014
4,465,604		Jan. 14, 2014	For: Clothing, namely, shirts, hats, caps, belts, jackets, gloves, sweatshirts, lounge pants, and wrist bands in class 025
4,465,650		Jan. 14, 2014	For: Motorcycles and structural parts therefor in class 012
5,346,467	DAYMAKER	Nov. 28, 2017	For: Motorcycle headlamp in class 011

1,316,576	EAGLE IRON	Jan. 29, 1985	For: Motorcycle electrical parts, namely, coils, brushes, armatures, generators in class 007 For: Motorcycle parts, namely gear shafts, starters, clutches, sprockets, battery covers and straps, air cleaners and filters in class 012
3,818,854	FAT BOY	Jul. 13, 2010	For: Non-luminous, non-mechanical tin signs, non-luminous and non-mechanical metal signs in class 006
5,346,443	FXRG	Nov. 28, 2017	For: Helmets in class 009
5,493,726	FXRG	Jun. 12, 2018	For: Eyewear, body armor in class 009
2,530,093	FXRG	Jan. 15, 2002	For: Jackets, coats, suits, gloves and pants in class 025
5,770,303	FXRG	June 4, 2019	For: Clothing, namely, sweaters, jackets, scarves, bandannas, vests, jeans, pants, chaps, shirts, caps, hats, headgear for wear, belts, wristbands, coveralls, trousers, rain suits, rain coats, T-shirts, head bands, neck gators, socks, leg warmers, mittens, leather clothing, bibs; footwear, namely, shoes and boots in class 025.
2,817,659	MOTORCLOTHES	Feb. 24, 2004	For: Clothing, namely belts, coats, jackets, caps, hats, head wear, knit hats, gloves, jeans, pants, chaps, shorts, shirts, sweaters, halter tops, tank tops, T-

			shirts, sweatshirts, sweat pants, head bands, leather coats, leather jackets, leather pants, leather chaps, leather vests, nightgowns, night shirts, pajamas, rain coats, rain suits, scarves, lingerie, underwear, vests, and wristbands; footwear; namely, shoes and boots in class 025
3,734,072	SCREAMIN' EAGLE	Jan. 5, 2010	For: Caps, jackets, shirts, and sweatshirts; t-shirts in class 025
1,434,821	WILLIE G	Mar. 31, 1987	For: Jackets in class 025
2,892,609	 <p>“Orange Stripe Design” (a wide orange stripe outlined by two narrow stripes)</p>	Oct. 12, 2004	For: Clothing, namely jackets, shirts in class 025
3,110,597	STREET BOB	Jun 27, 2006	For: Motorcycles and motorcycle structural parts in class 012

THIS COURT FURTHER FINDS that injunctive relief previously granted in the Temporary Restraining Order (“TRO”) should remain in place through the pendency of this litigation and that issuing this Preliminary Injunction is warranted under Federal Rule of Civil Procedure 65. Evidence submitted in support of this Motion and in support of Harley-Davidson’s previously granted Motion for Entry of a Temporary Restraining Order establishes that Harley-Davidson has demonstrated a likelihood of success on the merits; that no remedy at law exists; and that Harley-Davidson will suffer irreparable harm if the injunction is not granted. Specifically,

Harley-Davidson has proved a *prima facie* case of trademark infringement because (1) the HARLEY-DAVIDSON Trademarks are distinctive marks and are registered with the U.S. Patent and Trademark Office on the Principal Register, (2) Defendants are not licensed or authorized to use any of the HARLEY-DAVIDSON Trademarks, and (3) Defendants' use of the HARLEY-DAVIDSON Trademarks is causing a likelihood of confusion as to the origin or sponsorship of Defendants' products with Harley-Davidson. Furthermore, Defendants' continued and unauthorized use of the HARLEY-DAVIDSON Trademarks irreparably harms Harley-Davidson through diminished goodwill and brand confidence, damage to Harley-Davidson's reputation, loss of exclusivity, and loss of future sales. Monetary damages fail to address such damage and, therefore, Harley-Davidson has an inadequate remedy at law. Moreover, the public interest is served by entry of this Preliminary Injunction to dispel the public confusion created by Defendants' actions. As such, this Court orders that:

1. Defendants, their officers, agents, servants, employees, attorneys, confederates, and all persons acting for, with, by, through, under or in active concert with them be preliminarily enjoined and restrained from:
 - a. using the HARLEY-DAVIDSON Trademarks or any reproductions, counterfeit copies or colorable imitations thereof in any manner in connection with the distribution, marketing, advertising, offering for sale, or sale of any product that is not a genuine Harley-Davidson product or not authorized by Harley-Davidson to be sold in connection with the HARLEY-DAVIDSON Trademarks;
 - b. passing off, inducing, or enabling others to sell or pass off any product as a genuine Harley-Davidson product or any other product produced by Harley-Davidson, that is not Harley-Davidson's or not produced under the authorization, control or supervision

- of Harley-Davidson and approved by Harley-Davidson for sale under the HARLEY-DAVIDSON Trademarks;
- c. committing any acts calculated to cause consumers to believe that Defendants' products are those sold under the authorization, control or supervision of Harley-Davidson, or are sponsored by, approved by, or otherwise connected with Harley-Davidson;
 - d. further infringing the HARLEY-DAVIDSON Trademarks and damaging Harley-Davidson's goodwill; and
 - e. manufacturing, shipping, delivering, holding for sale, transferring or otherwise moving, storing, distributing, returning, or otherwise disposing of, in any manner, products or inventory not manufactured by or for Harley-Davidson, nor authorized by Harley-Davidson to be sold or offered for sale, and which bear any of Harley-Davidson's trademarks, including the HARLEY-DAVIDSON Trademarks, or any reproductions, counterfeit copies or colorable imitations thereof.
2. Upon Harley-Davidson's request, any third party with actual notice of this Order who is providing services for any of the Defendants, or in connection with any of the Defendants' Online Marketplaces, including, without limitation, any online marketplace platforms such as eBay, Inc. ("eBay"), AliExpress, Alibaba Group Holding Ltd. ("Alibaba"), Amazon.com, Inc. ("Amazon"), ContextLogic Inc. d/b/a Wish.com ("Wish.com"), and Dhgate, (collectively, the "Third Party Providers") shall, within ten (10) business days after receipt of such notice, provide to Harley-Davidson expedited discovery, including copies of all documents and records in such person's or entity's possession or control relating to:

- a. the identities and locations of Defendants, their agents, servants, employees, confederates, attorneys, and any persons acting in concert or participation with them, including all known contact information, and all associated e-mail addresses;
 - b. the nature of Defendants' operations and all associated sales, methods of payment for services and financial information, including, without limitation, identifying information associated with the Online Marketplaces and Defendants' financial accounts, as well as providing a full accounting of Defendants' sales and listing history related to their respective Online Marketplaces; and
 - c. any financial accounts owned or controlled by Defendants, including their agents, servants, employees, confederates, attorneys, and any persons acting in concert or participation with them, including such accounts residing with or under the control of any banks, savings and loan associations, payment processors or other financial institutions including, without limitation, PayPal, Inc. ("PayPal"), Alipay, Alibaba, Ant Financial Services Group ("Ant Financial"), Amazon Pay, Wish.com, or other merchant account providers, payment providers, third party processors, and credit card associations (e.g., MasterCard and VISA).
3. Upon Harley-Davidson's request, those with notice of the injunction, including Third Party Providers as defined in Paragraph 2, shall, within ten (10) business days after receipt of such notice, disable and cease displaying any advertisements used by or associated with Defendants in connection with the sale of counterfeit and infringing goods using the HARLEY-DAVIDSON Trademarks.

4. Defendants shall be temporarily and preliminarily restrained and enjoined from transferring or disposing of any money or other of Defendants' assets until further ordered by this Court.
5. Any Third Party Providers, including PayPal, Wish.com, Alipay, Alibaba, Ant Financial and Amazon Pay, shall, within ten (10) business days of receipt of this Order:
 - a. locate all accounts and funds connected to Defendants' Seller Aliases and Online Marketplaces, including, but not limited to, any financial accounts connected to the information listed in Schedule A hereto, the e-mail addresses identified in Exhibit 3 to the Declaration of Adraea M. Brown, and any e-mail addresses provided for Defendants by third parties; and
 - b. restrain and enjoin any such accounts or funds from transferring or disposing of any money or other of Defendants' assets until further ordered by this Court.
6. Harley-Davidson is authorized to issue expedited written discovery, pursuant to the Federal Rules of Civil Procedure 33, 34 and 36, related to:
 - a. the identities and locations of Defendants, their agents, servants, employees, confederates, attorneys, and any persons acting in concert or participation with them, including all known contact information, including any and all associated e-mail addresses; and
 - b. the nature of Defendants' operations and all associated sales, methods of payment for services and financial information, including, without limitation, identifying information associated with the Online Marketplaces and Defendants' financial accounts, as well as providing a full accounting of Defendants' sales and listing history related to their respective Online Marketplaces.

Harley-Davidson is authorized to issue any such expedited discovery requests via e-mail. Defendants shall respond to any such discovery requests within three (3) business days of being served via e-mail.

7. Harley-Davidson may provide notice of these proceedings to Defendants, including service of process pursuant to Fed. R. Civ. P. 4(f)(3), and any future motions, by electronically publishing a link to the Complaint, this Order and other relevant documents on a website and by sending an e-mail to the e-mail addresses identified in Exhibit 3 to the Declaration of Adraea M. Brown and any e-mail addresses provided for Defendants by third parties that includes a link to said website. The Clerk of the Court is directed to issue a single original summons in the name of “The Partnerships and all other Defendants identified in the Complaint” that shall apply to all Defendants. The combination of providing notice via electronic publication and e-mail, along with any notice that Defendants receive from payment processors, shall constitute notice reasonably calculated under all circumstances to apprise Defendants of the pendency of the action and afford them the opportunity to present their objections.
8. Schedule A to the Complaint [2], Exhibit 3 to the Declaration of Adraea M. Brown [15], and the TRO [24] are unsealed.
9. Any Defendants that are subject to this Order may appear and move to dissolve or modify the Order as permitted by and in compliance with the Federal Rules of Civil Procedure and Northern District of Illinois Local Rules.

10. The \$10,000 bond posted by Harley-Davidson shall remain with the Court until a Final disposition of this case or until this Preliminary Injunction is terminated.

IT IS SO ORDERED.

DATED: March 4, 2021

A handwritten signature in black ink, consisting of a large, loopy 'J' followed by a stylized 'A' and a period.

Jorge L. Alonso
United States District Judge

**H-D U.S.A., LLC v. The Partnerships and Unincorporated Associations Identified on Schedule
"A" - Case No. 21cv-00499**

Schedule A

No.	Seller Aliases
1	OUR SALAN Store
3	MAGE WORLD Bike Wholesaler Store
5	Aaron., co ltd Store
7	CROSSSUNAI Store
9	GUO BIKE Store
11	pengrongup Official Store
13	iDzn Newborn Clothes Store
15	KENDIM SECTIM Store
17	NewBetter Store
19	Cystal Accessories Store
21	Shop5885784 Store
23	Shop900249236 Store
25	Sundrewr Store
27	nilart_word Store
29	Shop910367296 Store
31	Shop910640048 Store
33	Shop910729150 Store
35	FH digital 017 Store
37	Shop910747155 Store
39	Shop910948053 Store
41	Shop910951065 Store
43	Reinventing trend Store
45	Shop910988071 Store
47	Shop911017063 Store
49	KDH8 Store
51	WANG CHUNMEI
53	TYHGF
55	SZRZTR
57	June-US
59	tyrertyr
61	NYFlying
63	Wofei mall
65	kaifenghuangcaishangmaoyouxiang ongsi

No.	Seller Aliases
2	SHIMANOx Store
4	Europe 3d picture
6	EVA LADY Official Store
8	shimanoplus Store
10	Karnoz Store
12	Shop5251344 Store
14	Domomo Store
16	Mother Clothes Show Store
18	GROMD Store
20	Shop5885764 Store
22	Dafu design Store
24	t-shirt016 Store
26	Shop910331347 Store
28	VectorWear Store
30	Shop910558312 Store
32	StevenXjan Store
34	Shop910737084 Store
36	Shop910745159 Store
38	Shop910873006 Store
40	Shop910949027 Store
42	Shop910965071 Store
44	Shop910976001 Store
46	Farraw Store
48	Shop911051034 Store
50	JT Shoping
52	FuXindream
54	Heinmo
56	taiyuanshiyingzequyangboshuiguodi an
58	liaohuilong2
60	Natasha Breeden
62	AmaAguirrend
64	sazwdk
66	4CAR&

No.	Seller Aliases
67	WANGJQIN
69	A15VU8DMFXALLY
71	LeiChuangShangMao
73	Lvliangshilishiquhebianpingzongheji ngxiaobu
75	MEIYAQQ
77	shenzhenshiyuqianygoudianziyouxi anbflpv
79	UntilYouGifts
81	QiDongXianQuanDeBaiHuoDian
83	WANSU commerce and trade
85	aairprdds
87	seatesme266
89	HZSXMASK
91	QuanQuan-us
93	rdtyhrtu
95	A1D0416K3CM5P7
97	FGJIUSHINIU
99	Never night sky
101	Radella
103	ShenZhenShiDongBinShiYeYouXianG ongSi
105	SSHSHOP
107	BEER#
109	liangzisupermarket
111	huizhoushihuichengquminggebianli dian
113	SUHERVEX
115	OfinaZyx
117	A1K875DDN1YN1A
119	dingyashangmao
121	Small beautiful sister
123	PTDMD
125	ShenYangTieXiQuYiMaoJianCaiDian
127	HeNanKeZuoShangMaoYouXianGon gSi
129	SrySmUS

No.	Seller Aliases
68	Weiye Personality Store
70	W-TinSigns
72	Kacol-Studio
74	HSZSZY
76	Twifon ZZY CYAN
78	Kardiya
80	EAGFLY
82	SUEXI
84	RiZhaoTianChongShangMaoYouXian GongSi
86	WENDING88
88	KeLin
90	Ang-xw
92	HIBEOULEB
94	ogdfdrffdd
96	HeNanGeDaJiXieSheBeiAnZhuangYo uXianGongSi
98	CKeKe
100	guang zhou ye sen fu shi you xian gong si
102	Tseven Store
104	QPLAYnm
106	TongChengMinLanBaiHuoDian
108	qinhanxinchengheyihaobaihodian
110	SNIDKES
112	TOPUSE
114	SHUIZAoba
116	Greeeen Parrot
118	lv liang shi li shi qu xiao cao bian li dian
120	ningyu decor
122	unyuexuefu
124	Mal-II
126	lv liang shi li shi qu wei ying bian li dian
128	JFHGYUW
130	SerendS

No.	Seller Aliases
131	FMLAC
133	JIAHEJIA
135	ninglingxianbahuirizapu
137	SuperFan
139	putianshichengxiangqulvnongyimipu
141	WENBINXSL
143	ShanDongHuiZeFuWuWaiBao
145	GaoXinQuMeiHengDaDianZiChanPinJingYingBu
147	QingXinQuTaiHeZhenXuFengJianCaiDian
149	Powit
151	tianlanqu
153	Kooqi
155	LOVELYSOUL
157	Sattfashion
159	Ho Nok TAT trading company
161	FLYING SMART DEVELOPMENT LIMITED
163	CHENGKUO
165	NBHHPLS
167	erdftrtded
169	Bimkole
171	Pet DreamWorks
173	Lucsy
175	RMLiu
177	WHMPJG
179	Day Romero
181	FliFlition
183	Baby ying
185	suyuquxinghahabochongwudian-1
187	A2C3SC020G3WLH
189	shenzhenshichenyunshiyeyouxiangongsi
191	U9U3QP59UK
193	Million Questions
195	Homus
197	DOORZ

No.	Seller Aliases
132	ABCDOR
134	BiBuBaLa
136	Pendapu
138	maiJiaJianBingDian
140	Bvancuh
142	SONGWIEUS
144	Simon-Stark
146	Noki home
148	OAZNnk0
150	VAYUDD
152	LinXianTuBanLiGuoChaoShi
154	SANZHUCAO
156	Travel Poster
158	Bright world us
160	lucky baby#
162	ONE-THREE-ONE
164	RenChengQuDaZiRanChongWuShiPinDian
166	Hi-WISH
168	Tisha Reveiro
170	Hao Shunda
172	WANLINGRR
174	Qin Guo She Ji
176	My_OP_Home
178	LoveStar-Us
180	ouaomaoyi
182	Onlyhu
184	Tesgo-DIY
186	qutichenwangluokejiyouxiangongsi
188	Chaobaotongzhuang Store
190	CHENYAN00
192	sterrp
194	Sunflower Home
196	900 million Accessories
198	BQQDP

No.	Online Marketplaces
1	aliexpress.com/store/1190688
3	aliexpress.com/store/1798202
5	aliexpress.com/store/2677075
7	aliexpress.com/store/4015012
9	aliexpress.com/store/5043036
11	aliexpress.com/store/5082477
13	aliexpress.com/store/5253160
15	aliexpress.com/store/5367020
17	aliexpress.com/store/5874747
19	aliexpress.com/store/5877564
21	aliexpress.com/store/5885784
23	aliexpress.com/store/900249236
25	aliexpress.com/store/910328017
27	aliexpress.com/store/910342078
29	aliexpress.com/store/910367296
31	aliexpress.com/store/910640048
33	aliexpress.com/store/910729150
35	aliexpress.com/store/910741124
37	aliexpress.com/store/910747155
39	aliexpress.com/store/910948053
41	aliexpress.com/store/910951065
43	aliexpress.com/store/910972038
45	aliexpress.com/store/910988071
47	aliexpress.com/store/911017063
49	aliexpress.com/store/911060152
51	amazon.com/s?me=A1R3M7XG3861YV&marketplaceID=ATVPDKIKX0DER
53	amazon.com/s?me=A2T4SAR8E8LC0&marketplaceID=ATVPDKIKX0DER
55	amazon.com/s?me=A32PCHAQHS8Q72&marketplaceID=ATVPDKIKX0DER
57	amazon.com/s?me=A3I7DY6GIL62TQ&marketplaceID=ATVPDKIKX0DER
59	amazon.com/sp?seller=A11HFKCPMIQQEE
61	amazon.com/sp?seller=A11V0K6ST5BTMC
63	amazon.com/sp?seller=A13BTZU2NHLTWR

No.	Online Marketplaces
2	aliexpress.com/store/1687429
4	aliexpress.com/store/2301020
6	aliexpress.com/store/2685025
8	aliexpress.com/store/4481046
10	aliexpress.com/store/5079507
12	aliexpress.com/store/5251344
14	aliexpress.com/store/5268014
16	aliexpress.com/store/5781559
18	aliexpress.com/store/5875899
20	aliexpress.com/store/5885764
22	aliexpress.com/store/5891432
24	aliexpress.com/store/900254056
26	aliexpress.com/store/910331347
28	aliexpress.com/store/910367014
30	aliexpress.com/store/910558312
32	aliexpress.com/store/910729025
34	aliexpress.com/store/910737084
36	aliexpress.com/store/910745159
38	aliexpress.com/store/910873006
40	aliexpress.com/store/910949027
42	aliexpress.com/store/910965071
44	aliexpress.com/store/910976001
46	aliexpress.com/store/910994069
48	aliexpress.com/store/911051034
50	amazon.com/s?me=A1FKPDBNC5M9IW&marketplaceID=ATVPDKIKX0DER
52	amazon.com/s?me=A2QF4P9LBE84IX&marketplaceID=ATVPDKIKX0DER
54	amazon.com/s?me=A316BIAY0DI2MI&marketplaceID=ATVPDKIKX0DER
56	amazon.com/s?me=A33N47GNK2A18B&marketplaceID=ATVPDKIKX0DER
58	amazon.com/sp?seller=A11CN8VU7TYTVU
60	amazon.com/sp?seller=A11P5EW1XE8MJD
62	amazon.com/sp?seller=A11W48AUKHHD2X
64	amazon.com/sp?seller=A142WU7YW9F85P

No.	Online Marketplaces
65	amazon.com/sp?seller=A14PKWU7COCHZQ
67	amazon.com/sp?seller=A14VTLHDFMECIS
69	amazon.com/sp?seller=A15VU8DMFXALLY
71	amazon.com/sp?seller=A167RVJ683V26U
73	amazon.com/sp?seller=A16NY0YKJWSYFJ
75	amazon.com/sp?seller=A1733FRDX9YNTY
77	amazon.com/sp?seller=A17EDZ8Q2QFCHN
79	amazon.com/sp?seller=A17VMSJMDCEC6
81	amazon.com/sp?seller=A18COLUSSBKRX
83	amazon.com/sp?seller=A19HNK1DOSPCC2
85	amazon.com/sp?seller=A19U8L6GG2GEHP
87	amazon.com/sp?seller=A1AM1TM844645B
89	amazon.com/sp?seller=A1ATLDNVY7TEFP
91	amazon.com/sp?seller=A1BEHT1Q1ZPW8Q
93	amazon.com/sp?seller=A1BQDIVRAS6AJ7
95	amazon.com/sp?seller=A1D0416K3CM5P7
97	amazon.com/sp?seller=A1DHHDP3GE0OQ4
99	amazon.com/sp?seller=A1EH0GRX2BP1IF
101	amazon.com/sp?seller=A1FD5PRK2ZI6RI
103	amazon.com/sp?seller=A1G0QIM4UPYL2R
105	amazon.com/sp?seller=A1GKA62C0HU97R

No.	Online Marketplaces
66	amazon.com/sp?seller=A14RJ35JZNWIF4
68	amazon.com/sp?seller=A15U1X03UAUSHB
70	amazon.com/sp?seller=A167LOJANQDWR8
72	amazon.com/sp?seller=A16EJSD3EI7OY0
74	amazon.com/sp?seller=A16UH21PL18M4K
76	amazon.com/sp?seller=A179TY9M2QIZG6
78	amazon.com/sp?seller=A17PZQAT1NLVIQ
80	amazon.com/sp?seller=A18378V77T9BHT
82	amazon.com/sp?seller=A196R56T4MMSY1
84	amazon.com/sp?seller=A19L47M0G9QVHO
86	amazon.com/sp?seller=A1AB3TZB8IQNIO
88	amazon.com/sp?seller=A1APNEQZPK2LKQ
90	amazon.com/sp?seller=A1AUS05TQQ4XZM
92	amazon.com/sp?seller=A1BKF3C1GUQHLP
94	amazon.com/sp?seller=A1C8JA6NR2S2GQ
96	amazon.com/sp?seller=A1DB7S29HSKS2M
98	amazon.com/sp?seller=A1E8Y6HTZEXV9Z
100	amazon.com/sp?seller=A1FAPHC3E1HXO7
102	amazon.com/sp?seller=A1FKCYXBWY3RDB
104	amazon.com/sp?seller=A1G7BEJZZPC5OQ
106	amazon.com/sp?seller=A1GXQQ6ZTMFU3D

No.	Online Marketplaces
107	amazon.com/sp?seller=A1GY69FA076RS1
109	amazon.com/sp?seller=A1HCFLTWFYQFH4
111	amazon.com/sp?seller=A1HW7YW D716HNL
113	amazon.com/sp?seller=A1IHQ72ZN RGXS
115	amazon.com/sp?seller=A1JKTUJRA VLBP7
117	amazon.com/sp?seller=A1K875DDN 1YN1A
119	amazon.com/sp?seller=A1LHGM8B ZV4ZMW
121	amazon.com/sp?seller=A1N0BT2FB MIGY
123	amazon.com/sp?seller=A1NQP683B FXTH2
125	amazon.com/sp?seller=A1NUEC7IN U8PWS
127	amazon.com/sp?seller=A1O0U5V4 GBRZN7
129	amazon.com/sp?seller=A1PA5FO3I CS0AI
131	amazon.com/sp?seller=A1Q9PCGRT GMNWP
133	amazon.com/sp?seller=A1QCKJ9TM Z8F0N
135	amazon.com/sp?seller=A1QHBXY45 KG3CZ
137	amazon.com/sp?seller=A1RK0XEIP O40Z2
139	amazon.com/sp?seller=A1SANQ9O YEWM8D
141	amazon.com/sp?seller=A1SW56PZ0 34LK6
143	amazon.com/sp?seller=A1TQPWCP K1OJZ7
145	amazon.com/sp?seller=A1U1M9FF HMLJ47
147	amazon.com/sp?seller=A1V35X45 MZR2DW

No.	Online Marketplaces
108	amazon.com/sp?seller=A1GZT14VV2F HZT
110	amazon.com/sp?seller=A1HOOYKM4T 74ZN
112	amazon.com/sp?seller=A1ICMHX2TC M1J0
114	amazon.com/sp?seller=A1JGQQLUHD 6GF1
116	amazon.com/sp?seller=A1K1068YJN5 0F8
118	amazon.com/sp?seller=A1L3Z60MRRJ M9P
120	amazon.com/sp?seller=A1MEOG7LDH KJBO
122	amazon.com/sp?seller=A1NK2CC2VX H98H
124	amazon.com/sp?seller=A1NSN29I316 11B
126	amazon.com/sp?seller=A1NXEXAFS28 F3N
128	amazon.com/sp?seller=A1O5VP82GTI ZS4
130	amazon.com/sp?seller=A1PMEYUXYP ENW8
132	amazon.com/sp?seller=A1QC0TT9GN T5QY
134	amazon.com/sp?seller=A1QFAX2O8H BKFR
136	amazon.com/sp?seller=A1R18QEDDV DS7V
138	amazon.com/sp?seller=A1RQZZD36X2 BOJ
140	amazon.com/sp?seller=A1ST336ZYG W4O0
142	amazon.com/sp?seller=A1SYKGBXR24 FPX
144	amazon.com/sp?seller=A1TUTEBOX65S WTY
146	amazon.com/sp?seller=A1UD98RWW 63T0D
148	amazon.com/sp?seller=A1VRETKGC0 MRH8

No.	Online Marketplaces
149	amazon.com/sp?seller=A1W0D0L5ORLG6Y
151	amazon.com/sp?seller=A1WND5QD85EICM
153	amazon.com/sp?seller=A1Y4RIXZ1OJIL7
155	amazon.com/sp?seller=A1YBTBS1A2TFF5
157	amazon.com/sp?seller=A1ZI1V21HE3MWO
159	amazon.com/sp?seller=A20BF15BAYBZCY
161	amazon.com/sp?seller=A21CT0FIFFC35D
163	amazon.com/sp?seller=A2399QH00X7KUG
165	amazon.com/sp?seller=A23J441O1AIBE9
167	amazon.com/sp?seller=A255UJTP0HUIJWL
169	amazon.com/sp?seller=A25EPAT35POG39
171	amazon.com/sp?seller=A25VA74V1FBTFV
173	amazon.com/sp?seller=A261I20CT6OVLO
175	amazon.com/sp?seller=A26E2UVFE6UUM8
177	amazon.com/sp?seller=A27MN4A28BNSGW
179	amazon.com/sp?seller=A29BSXFOYIOMH
181	amazon.com/sp?seller=A29UWE5PCPH3Y5
183	amazon.com/sp?seller=A2AKQ8F4QOSNQN
185	amazon.com/sp?seller=A2BGC3Y1TRER7L
187	amazon.com/sp?seller=A2C3SC020G3WLH
189	amazon.com/sp?seller=A2CWGTFU2OJ314

No.	Online Marketplaces
150	amazon.com/sp?seller=A1WE6QADO NSS4N
152	amazon.com/sp?seller=A1WUOOFJCO DBC6
154	amazon.com/sp?seller=A1Y7FO6QA5 2DNL
156	amazon.com/sp?seller=A1YLEILXHKO AUU
158	amazon.com/sp?seller=A20ADQ2OV WF7FZ
160	amazon.com/sp?seller=A20OHZ3F416 UZE
162	amazon.com/sp?seller=A22REJZX7JTE 05
164	amazon.com/sp?seller=A23EDYLHZD2 PX9
166	amazon.com/sp?seller=A23LJ6LNIQM 71Q
168	amazon.com/sp?seller=A256YZJA9C4J 0B
170	amazon.com/sp?seller=A25GYBGGV1 9Z06
172	amazon.com/sp?seller=A25X21NCAS OHN5
174	amazon.com/sp?seller=A2676L8BQSX 2VW
176	amazon.com/sp?seller=A27FIWCZW7 5PBX
178	amazon.com/sp?seller=A2824C2C34B 29S
180	amazon.com/sp?seller=A29KWU8KJV B8NX
182	amazon.com/sp?seller=A2AELUVP1G7 7AK
184	amazon.com/sp?seller=A2B7MEBMQ ZN8NO
186	amazon.com/sp?seller=A2BLADRRFZ4 MEL
188	amazon.com/sp?seller=A2C5WGE35E GI60
190	amazon.com/sp?seller=A2D3CFHVNA UVNM

No.	Online Marketplaces
191	amazon.com/sp?seller=A2E52N3SH QLOYL
193	amazon.com/sp?seller=A2FEF34GA SAL78
195	amazon.com/sp?seller=A2FS7S48M BIZO6
197	amazon.com/sp?seller=A2GF1BQX2 KUMPM

No.	Online Marketplaces
192	amazon.com/sp?seller=A2E9H00H78X 9VU
194	amazon.com/sp?seller=A2FRG5NIA1K P7O
196	amazon.com/sp?seller=A2G7EJ8PSO0 EF5
198	amazon.com/sp?seller=A2GIDDJK6VO 5XA